

October 5, 2010

Violet Barton
Executive Director
Safequest Solano, Inc.
1745 Enterprise Drive, Suite 2-D
Fairfield, Ca 94533

SUBJECT: Performance Assessment Report **GRANT #:** DV09091438 & DR09011438 **RECIPIENT NAME:** Safequest Solano, Inc.

Dear Ms. Barton,

Thank you again for your time on September 23, 2010, when I conducted a Performance Assessment of the Domestic Violence Assistance (DV) Program grant for your agency. Attached please find a copy of the Performance Assessment including the Domestic Violence Recovery Act (DR) Addendum.

During the site visit, we discussed Cal EMA's requirements for the project, the goals and objectives of the program, the project's source documentation, and the reporting requirements. As a result of the visit, I have identified the following areas which need corrective action.

Client Confidentiality

<u>Current Policy</u>: No written policy exists for the handling, storage, and eventual destruction of files, nor does a policy specifically identify the time period long term files should be kept. <u>Citation</u>: Both the Victims Of Crime Act and the Family Violence Prevention Act contain provisions protecting the confidentiality of victims. Specifically, 42 U.S.C. 10402 (a)(2)(E) authorizes the state to ensure documented procedures have been developed and implemented (to include policies and procedures) "to assure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services by any program assisted under this chapter…"

<u>Recommendation</u>: Written protocols should be established for the long-term storage of and eventual destruction of client files, in order to protect against the dissemination of confidential client information. Evidence of the development of a written policy should be submitted to Cal EMA no later than **April 5, 2011.**

Functional Timesheets

<u>Finding:</u> The project is not currently using functional timesheets to track grant funded positions.

<u>Citation:</u> The Recipient Handbook (Section 11331) states "All grant-funded personnel must maintain time cards/sheets that indicate on a daily basis, the actual time worked on

3650 SCHRIEVER AVENUE • MATHER, CA 95655 PUBLIC SAFETY & VICTIM SERVICES DIVISION (916) 327-3672 • (916) 327-5674 FAX each Cal EMA project and account for all the time worked by the employee during the pay period... An allocation plan may be used to allocate salaries and benefits for individuals who work on more than one program or grant (see Section 2173)."

<u>Corrective Action:</u> A copy of the new functional timesheet should be submitted to Cal EMA no later than **April 5**. Additionally, the Employee Handbook should be revised to provide policy as to the use of functional timesheets.

Fidelity Bond

<u>Finding:</u> The Fidelity Bond Certificate held by the agency lacks a grant number identifying which funds the bond covers as listed in the Recipient Handbook.

<u>Citation:</u> Recipient Handbook, Fidelity Bond, Section 2160, requires recipients to obtain a fidelity bond or an equivalent employee dishonesty insurance contract in an amount equal to 50 percent of the total grant award, less matching funds. Section 2161.2 indicates the Fidelity Bond must include Form A, Employee Dishonesty, and Form B, Forgery Coverage. The Fidelity Bond must provide blanket coverage of all employees; a scheduled bond is not acceptable. Further, Section 2161.4 states the certificate holder or first loss payee must be the State of California, Emergency Management Agency. The grant numbers for each grant covered must be included.

<u>Corrective Action:</u> See Recipient Handbook Section 2160, Certificate of Insurance, for the components that must be included in the certificate. Documentation from an insurance carrier that verifies the grant recipient is in compliance with this requirement must be submitted to Cal EMA by **April 5, 2011.**

<u>Organizational and Personnel Policies and Procedures</u>

<u>Finding</u>: The project lacks written standardized organizational policy and procedures that establish the process whereby data is collected and then reported.

<u>Citation</u>: Recipient Handbook Section 11350 states, "The organization must have written policies and procedures covering hiring, firing, termination, conflict of interest, benefits, salary rates, travel, etc. There should also be written procedures regarding the accounting and reporting functions... In addition, any other policies and procedures (e.g., purchasing contracts) that relate to operating the project must be in writing."

<u>Corrective Action</u>: A comprehensive administrative policy and procedure manual should be created to formally document the methods used for the collection of data related to the project, the responsibility of personnel involved in the reporting of data, as well as all other procedural guidelines for the functioning of the business. This process should be completed no later than **April 5, 2010**.

Fiscal Source Documentation

<u>Finding</u>: The project lacks a reliable and comprehensive records and source documentation reflecting its fiscal practices.

<u>Citation</u>: Recipient Handbook Section 11312 states, "All general ledger account entries for revenues and expenditures must be supported by subsidiary records, the original source documentation, canceled checks, and bank statements... Source documentation includes invoices, bills and vouchers. The format of subsidiary records is determined by the project. The project must be able to trace the general ledger entries to the Report of Expenditures and Request for Funds (CalEMA2-201)."

<u>Corrective Action</u>: The project must develop a comprehensive system for tracking and reporting fund expenditures. The project must be able to trace all expenditures reported to the grant for each month of the grant period; in doing so, the project must be able to show all source documentation associated with each month's billing. Further, the entire financial process for the project should be documented in a Financial Policy and Procedures manual, that is approved by the project's Board of Directors. This process should be completed no later than **April 5, 2010.**

Administrative Recommendations:

- Safequest should hire a Financial Officer whose sole responsibility should be the management of the projects financial reporting, record keeping, and other fiduciary responsibilities. While Marlene Altman is currently serving as the agencies Financial Officer, her duties include far more than managing the project's ledger and financial records. A financial expert should be hired to fulfill this need as soon as possible.
- 2) Safequest is by admission of the administrative staff in serious debt that is jeopardizing the financial health and success of the agency. Safequest should seek legal counsel and financial counsel in order to find what options are available as well as to develop a financial strategy for moving forward.

As for the other documentation that you were required to provide at the time of the site visit, I will be placing copies in your DV09/10 file and your master file at Cal EMA headquarters.

Enclosed is a copy of the completed Site Visit Checklist Form for your review. Please sign the cover page and return a copy of the page to me by **Friday November 5, 2010 or sooner** as confirmation of receipt.

Thank you again for your hospitality during this visit. If you have any questions regarding the site visit please contact me at 916.324.9104 or Jason.Stalder@calema.ca.gov.

Jason Stalder Criminal Justice Specialist Domestic Violence Section

Enclosures

C: Cal EMA R&R Logistics